

FILED

JUL 31 2019

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:19 MJ 5252 NAB
	)	
TERRICK D. HARVEY,	)	
	)	
Defendant.	)	

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Nauman Wadalawala, Special Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with an offense for which a maximum 20-year imprisonment is prescribed under Title 21.
2. Defendant is currently wanted by the St. Louis Metropolitan Police Department for questioning regarding his involvement in a felony resisting arrest and armed criminal action investigation that occurred on July 3, 2019, wherein Defendant fled from the police and in doing so placed the public at risk by his reckless driving.
3. Defendant has prior arrests for unlawful use of a weapon, tampering with a motor vehicle and resisting arrest.

4. Upon the execution of the search warrant, Defendant's residence was found to have multiple firearms in close proximity of a distributable amount of heroin.

5. There is a serious risk that the defendant will flee.

6. The defendant is a threat to the community.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN

United States Attorney

/s/Nauman Wadalawala

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Special Assistant United States Attorney